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Individually and on Behalf of All Those Similarly Situated*

16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA
18 SHANNON RAY, KHALA TAYLOR, PETER
ROBINSON, KATHERINE SEBBANE, and
19 RUDY BARAJAS Individually and on Behalf of
All Those Similarly Situated,

20 Plaintiffs,

21 v.

22 NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, an unincorporated association,

24 Defendant.

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Case No. 1:23-cv-00425

**PLAINTIFFS' NOTICE OF FILING
UNREDACTED AMENDED NOTICE
OF MOTION AND MOTION FOR
CLASS CERTIFICATION AND
EXHIBITS IN SUPPORT THEREOF**

Judge: Hon. William B. Shubb
Courtroom: 5, 14th Floor
Date: March 3, 2025
Time: 1:30 PM

1 TO DEFENDANT AND ITS ATTORNEYS OF RECORD AND TO THE UNITED STATES
2 DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA:

3 PLEASE TAKE NOTICE that Plaintiffs Shannon Ray, Khala Taylor, Peter Robinson,
4 Katherine Sebbane, and Rudy Barajas (“Plaintiffs”), pursuant to Section VIII.A of the Stipulated
5 Protective Order (ECF No. 56) and the Court’s February 14, 2025 Order (ECF No. 109) granting
6 in part and denying in part Plaintiffs’ sealing requests (ECF Nos. 91, 101), hereby file unredacted
7 copies of the following documents within five days of the order as requested by the Court:

- 8 • Plaintiffs’ Amended Notice of Motion and Motion for Class Certification.¹
- 9 • Exhibit 1 – Corrected Expert Report of Professor Orley Ashenfelter, dated

10 November 26, 2024.

11 • Exhibits 27-31 – Were previously filed under seal, but the NCAA withdrew their
12 objections, therefore, Plaintiffs are filing unredacted versions here.

13 • Exhibit 32 – Excerpts from Memorandum to the NCAA Division I Management
14 Council regarding Commentary Regarding Proposed Changes in Division I Legislation in which
15 the Division I Management Council did not take a position, dated February 28, 2001, bearing the
16 bates stamp NCAA_SMART-COLON_0179751.

17 • Exhibit 33 – Email from Leeland Zeller to Steve Mallonee regarding Proposals,
18 dated September 6, 2018, and bearing the bates stamp NCAA_SMART-COLON_0140536.

19 • Exhibits 35-44, 47-48 – Were previously filed under seal, but the NCAA withdrew
20 their objections, therefore, Plaintiffs are filing unredacted versions here.

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27 ¹ The Amended Motion was lodged with the Court on December 13, 2024 to remove references
28 to documents clawed back by third parties and Defendant after Plaintiffs filed their initial Motion
(ECF No. 85).

DATED: February 19, 2025

Respectfully submitted,

GUSTAFSON GLUEK PLLC

By: /s/ Dennis Stewart

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